

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

PATRICIA EMPSON,

Plaintiff,

v.

REEBOK INTERNATIONAL, LTD.,

Defendant.

Case No. 1:21-cv-00405-SEB-TAB

JOINT MOTION TO CORRECT CAPTION

Plaintiff, Patricia Empson (“Empson”) and Defendant, adidas Indy, LLC (misidentified as Reebok International, Ltd.) (“adidas”) (collectively the “Parties”), respectfully request the Court correct the caption in this matter to reflect the proper defendant. In support of this Motion, the Parties state:

1. On February 22, 2021, Empson filed her Complaint in this matter. (Dkt. 1). Empson inadvertently misidentified Reebok International, Ltd. as the named defendant.
2. Reebok International, Ltd is adidas’ parent company. *See* Dkt. 9 (Defendant’s Corporate Disclosure Statement).
3. adidas received service of the Complaint on or around March 11, 2021. adidas’ deadline to answer or otherwise respond to the Complaint has not yet passed.
4. adidas employed Empson from on or around July 25, 2011, to on or around October 1, 2020, and was Empson’s employer during the period relevant to the Complaint.¹

¹ adidas denies the allegations in Empson’s complaint and does not intend to waive any arguments or defenses by the filing of this motion.

5. As such, the Parties request the Court correct the caption in this matter to reflect adidas Indy, LLC as the named defendant.

Respectfully submitted,

/s/ Daniel K. Dilley (with permission)

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Respectfully submitted,

/s/ Emily L. Connor

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